

THYSSEN INC. EXCLUSION REQUEST

ATTACHMENT 2 CARBON AND ALLOY FLAT ROLLED, COLD ROLLED ENAMELING STEEL

- (a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States.

The merchandise subject to this request is known as carbon and alloy cold-rolled deep drawing enameling steel to ASTM A 424 type 3, interstitial-free, as per the chemistry below.

The applicable HTS provisions is: 7225.50.8085.

- (b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the products from products for which exclusion is not sought;

The product described above has the following properties:

Carbon	.02 max.
Titanium	.051 max.
Manganese	.35 max.
Phosphorus	.020 max.
Sulfur	.030 max.

Surface roughness 90 – 120 microinches, dry (no oil on surface)
Hardness 24-45 Rb.

- (c) The basis for requesting an exclusion;

Domestic production is estimated to equal only 1/3 of domestic consumption.

- (d) The names and locations of any producers, in the United States and foreign countries of the product;

AK Steel – USA
US Steel – USA
Nippon Steel – Japan
NKK Steel – Japan
Sollac – France

Stelco - Canada
ThyssenKrupp – Germany

- (e) Total U.S. Consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and the projected annual consumption for each year from 2001 to 2005, with a basis for the projection;

Estimated at 46,000 short tons and \$25,300,000 value for 1996 and 1997; 46,700 short tons and \$25,300,000 value for 1998; 53,100 short tons and \$29,205,000 value for 1999, and 64,600 short tons and \$35,530,000 value for 2000.

Estimated at 56,750 short tons and \$31,212,500 value for 2001; and 54,350 short tons and \$29,892,500 value for 2002-2004.

Estimated value for 2001 is \$31,000,000.

- (f) Total US production of the product for each year from 1996 to 2000, if any;

Specific quantities are not available as quantities are included in gross cold-rolled sheet statistics. Domestic production is estimated to equal only 1/3 of domestic consumption.

- (g) The identity of any US produced substitute for the product, total US production of the substitute for each year from 1996 to 2000, and the names of any US producers of the substitute;

Thyssen Inc. is not aware of any substitute.

CONCLUSION

We understand that the purpose of the USTR investigation is to determine appropriate remedies for the importation of certain steel products, which are produced by the domestic industry. We believe that US production of this product is insufficient to meet market demand. Accordingly, we respectfully request that carbon and alloy flat rolled, cold rolled enameling steel be excluded from any import restrictions, and that the language of any remedy order for HTS subheading 7225.50.8085 clearly exclude this product.